

From: [Mason, Steve](#)
To: [Shedd, Steven](#)
Subject: RE: Request for Info
Date: Monday, August 28, 2017 3:41:00 PM
Attachments: [image001.png](#)
[RMP Report -- Ineos -- Port Lavaca -- 2013.pdf](#)
[Ineos 2012 Tier II Report -- Green Lake, Port Lavaca, TX.pdf](#)

It's a little busy, as you can guess. I have attached their last RMP submittal from 2013... the latest Tier II form I can access is 2012, but I doubt the info has changed much (attached)... if you need a more recent Tier II, I can go to the State... Take care and stay safe...

With Regards, Steve



From: Shedd, Steven [mailto:Steven.Shedd@hq.dhs.gov]

Sent: Monday, August 28, 2017 3:31 PM

To: Mason, Steve

Subject: Request for Info

Steve, I know you are probably getting slammed but I am working in the Incident Management Cell and trying to get chem reporting info for recovery back into the areas of impact. We have limited info on this site as it is listed as an outlier. Hope all is well sir.

INEOS NITRILES USA LLC GREEN
LAKE PLANT

Address: TEXAS HWY 185, PORT LAVACA
TEXAS 77979 (CALHOUN)

(Map by [Google](#), [Yahoo](#))

County: CALHOUN

Public Contact: PAUL WACHTENDORF

Phone Number: 361-552-8225

Steve Shedd

Supervisory Chemical Security Inspector

DHS/NPPD/OIP/ISCD

Cell: 202-738-2764

Steven.Shedd@hq.dhs.gov

CFATS HELP DESK: (866) 323-2957

Questions Regarding CFATS: CSAT@DHS.GOV

WWW.DHS.GOV/CHEMICALSECURITY

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Section 1. Registration Information

Source Identification

Facility Name:	Ineos Nitriles USA LLC.
Parent Company #1 Name:	Ineos Nitriles USA LLC.
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	Voluntary update (not described by any of the above reasons)
Description:	
Receipt Date:	01-Mar-2013
Postmark Date:	01-Mar-2013
Next Due Date:	01-Mar-2018
Completeness Check Date:	08-Dec-2015
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0006 2095
Other EPA Systems Facility ID:	77979BPCHMTEXAS

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	175894752
Parent Company #1 DUNS:	
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	13050 Texas Hwy 185
Street 2:	
City:	Port Lavaca
State:	TEXAS
ZIP:	77979
ZIP4:	
County:	CALHOUN

Facility Latitude and Longitude

Latitude (decimal):	28.566421
Longitude (decimal):	-096.839191
Lat/Long Method:	Interpolation - Photo
Lat/Long Description:	Well
Horizontal Accuracy Measure:	25
Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	24000

Owner or Operator

Operator Name:	Paul Wachtendorf
Operator Phone:	(361) 552-8225

Mailing Address

Operator Street 1:	PO Box 659
Operator Street 2:	
Operator City:	Port Lavaca
Operator State:	TEXAS
Operator ZIP:	77979
Operator ZIP4:	
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Edgardo A Cruz Diaz
RMP Title of Person or Position:	PSM/Quality Coordinator
RMP E-mail Address:	edgardo.cruzdiaz@ineos.com

Emergency Contact

Emergency Contact Name:	Edgardo A Cruz Diaz
Emergency Contact Title:	PSM/Quality Coordinator
Emergency Contact Phone:	(361) 552-8443
Emergency Contact 24-Hour Phone:	(361) 552-8411
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	edgardo.cruzdiaz@ineos.com

Other Points of Contact

Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	(361) 552-8216
Facility or Parent Company WWW Homepage Address:	www.greenlake.biz

Local Emergency Planning Committee

LEPC:	Calhoun County LEPC
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Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	115
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes
EPCRA 302 :	Yes
CAA Title V:	Yes

Air Operating Permit ID:

01284

OSHA Ranking

OSHA Star or Merit Ranking:

Y

Last Safety Inspection

Last Safety Inspection (By an External Agency)
Date:

01-Dec-2015

Last Safety Inspection Performed By an External
Agency:

EPA

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name:

Preparer Phone:

Preparer Street 1:

Preparer Street 2:

Preparer City:

Preparer State:

Preparer ZIP:

Preparer ZIP4:

Preparer Foreign State:

Preparer Foreign Country:

Preparer Foreign ZIP:

Confidential Business Information (CBI)

CBI Claimed:

Substantiation Provided:

Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents:

See Section 6. Accident History below to determine
if there were any accidents reported for this RMP.

Process Chemicals

Process ID:

1000040571

Description:

Acrylonitrile Mfg

Process Chemical ID:

1000048761

Program Level:

Program Level 3 process

Chemical Name:

Flammable Mixture

CAS Number:

00-11-11

Quantity (lbs):

25000000

CBI Claimed:

Flammable/Toxic:

Flammable

Flammable Mixture Chemical Components

Flammable Mixture Chemical ID: 1000041511
Chemical Name: Propane
CAS Number: 74-98-6
Flammable/Toxic: Flammable

Flammable Mixture Chemical ID: 1000041510
Chemical Name: Propylene [1-Propene]
CAS Number: 115-07-1
Flammable/Toxic: Flammable

Process ID: 1000040571
Description: Acrylonitrile Mfg
Process Chemical ID: 1000048760
Program Level: Program Level 3 process
Chemical Name: Sulfur dioxide (anhydrous)
CAS Number: 7446-09-5
Quantity (lbs): 75000
CBI Claimed:
Flammable/Toxic: Toxic

Process ID: 1000040571
Description: Acrylonitrile Mfg
Process Chemical ID: 1000048759
Program Level: Program Level 3 process
Chemical Name: Hydrocyanic acid
CAS Number: 74-90-8
Quantity (lbs): 1700000
CBI Claimed:
Flammable/Toxic: Toxic

Process ID: 1000040571
Description: Acrylonitrile Mfg
Process Chemical ID: 1000048755
Program Level: Program Level 3 process
Chemical Name: Acrylonitrile [2-Propenenitrile]
CAS Number: 107-13-1
Quantity (lbs): 61000000
CBI Claimed:
Flammable/Toxic: Toxic

Process ID: 1000040571
Description: Acrylonitrile Mfg
Process Chemical ID: 1000048756
Program Level: Program Level 3 process
Chemical Name: Ammonia (anhydrous)
CAS Number: 7664-41-7
Quantity (lbs): 23000000

CBI Claimed:
Flammable/Toxic: Toxic

Process ID: 1000040571
Description: Acrylonitrile Mfg
Process Chemical ID: 1000048757
Program Level: Program Level 3 process
Chemical Name: Butane
CAS Number: 106-97-8
Quantity (lbs): 133000
CBI Claimed:
Flammable/Toxic: Flammable

Process ID: 1000040571
Description: Acrylonitrile Mfg
Process Chemical ID: 1000048758
Program Level: Program Level 3 process
Chemical Name: Chlorine
CAS Number: 7782-50-5
Quantity (lbs): 26000
CBI Claimed:
Flammable/Toxic: Toxic

Process NAICS

Process ID: 1000040571
Process NAICS ID: 1000040973
Program Level: Program Level 3 process
NAICS Code: 325199
NAICS Description: All Other Basic Organic Chemical Manufacturing

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000033480

Percent Weight:	8.1
Physical State:	Gas liquified by refrigeration
Model Used:	EPA's RMP*Comp(TM)
Release Duration (mins):	135
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Rural

Passive Mitigation Considered

Dikes:	Yes
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	splash wall added to top of concrete dike to prevent spillover

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000035429

Percent Weight:	
Physical State:	Liquid
Model Used:	EPA's RMP*Comp(TM)
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Rural

Passive Mitigation Considered

Dikes:	Yes
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Active Mitigation Considered

Sprinkler System:
 Deluge System:
 Water Curtain:
 Neutralization:
 Excess Flow Valve:
 Flares:
 Scrubbers:
 Emergency Shutdown:
 Other Type:

Toxic Alter ID: 1000035430

Percent Weight:	
Physical State:	Gas liquified by refrigeration
Model Used:	EPA's RMP*Comp(TM)
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Rural

Passive Mitigation Considered

Dikes:
 Enclosures:
 Berms:
 Drains:
 Sumps:
 Other Type:

Active Mitigation Considered

Sprinkler System:
 Deluge System:
 Water Curtain:
 Neutralization:
 Excess Flow Valve:
 Flares:
 Scrubbers:

Emergency Shutdown:

Other Type:

Toxic Alter ID: 1000035431

Percent Weight:

Physical State:

Model Used:

Wind Speed (m/sec):

Atmospheric Stability Class:

Topography:

Gas

EPA's RMP*Comp(TM)

3.0

D

Rural

Passive Mitigation Considered

Dikes:

Enclosures:

Berms:

Drains:

Sumps:

Other Type:

Active Mitigation Considered

Sprinkler System:

Deluge System:

Water Curtain:

Neutralization:

Excess Flow Valve:

Flares:

Scrubbers:

Emergency Shutdown:

Other Type:

Toxic Alter ID: 1000035432

Percent Weight:

Physical State:

Model Used:

Wind Speed (m/sec):

Atmospheric Stability Class:

Topography:

8.1

Gas liquified by refrigeration

EPA's RMP*Comp(TM)

3.0

D

Rural

Passive Mitigation Considered

Dikes:

Enclosures:

Berms:

Drains:

Sumps:

Other Type:

Yes

Active Mitigation Considered

Sprinkler System:

Deluge System:

Water Curtain:

Neutralization:

Excess Flow Valve:

Flares:

Scrubbers:
Emergency Shutdown:
Other Type:

Toxic Alter ID: 1000035433

Percent Weight:	
Physical State:	Gas
Model Used:	EPA's RMP*Comp(TM)
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Rural

Passive Mitigation Considered

Dikes:
Enclosures:
Berms:
Drains:
Sumps:
Other Type:

Active Mitigation Considered

Sprinkler System:
Deluge System:
Water Curtain:
Neutralization:
Excess Flow Valve:
Flares:
Scrubbers:
Emergency Shutdown:
Other Type:

Section 4. Flammables: Worst Case

Flammable Worst ID: 1000025271

Model Used:

EPA's RMP*Comp(TM)

Endpoint used:

1 PSI

Passive Mitigation Considered

Blast Walls:

Other Type:

Section 5. Flammables: Alternative Release

Flammable Alter ID: 1000023672

Model Used:

EPA's RMP*Comp(TM)

Passive Mitigation Considered

Dikes:

Fire Walls:

Blast Walls:

Enclosures:

Other Type:

Active Mitigation Considered

Sprinkler System:

Deluge System:

Water Curtain:

Excess Flow Valve:

Other Type:

Section 6. Accident History

Accident History ID: 1000027500

Date of Accident:	20-Jan-2009
Time Accident Began (HHMM):	2132
NAICS Code of Process Involved:	325199
NAICS Description:	All Other Basic Organic Chemical Manufacturing
Release Duration:	004 Hours 00 Minutes

Release Event

Gas Release:	
Liquid Spill/Evaporation:	Yes
Fire:	
Explosion:	
Uncontrolled/Runaway Reaction:	

Release Source

Storage Vessel:	
Piping:	Yes
Process Vessel:	
Transfer Hose:	
Valve:	
Pump:	
Joint:	
Other Release Source:	

Weather Conditions at the Time of Event

Wind Speed:	7.0
Units:	miles/h
Direction:	NW
Temperature:	45
Atmospheric Stability Class:	F
Precipitation Present:	
Unknown Weather Conditions:	

On-Site Impacts

Employee or Contractor Deaths:	0
Public Responder Deaths:	0
Public Deaths:	0
Employee or Contractor Injuries:	0
Public Responder Injuries:	0
Public Injuries:	0
On-Site Property Damage (\$):	0

Known Off-Site Impacts

Deaths:	0
Hospitalization:	0
Other Medical Treatments:	0
Evacuated:	0

Sheltered-in-Place: 0

Off-Site Property Damage (\$): 0

Environmental Damage

Fish or Animal Kills: Yes

Tree, Lawn, Shrub, or Crop Damage:

Water Contamination:

Soil Contamination:

Other Environmental Damage:

Initiating Event

Initiating Event:

Equipment Failure

Contributing Factors

Equipment Failure: Yes

Human Error:

Improper Procedures:

Overpressurization:

Upset Condition:

By-Pass Condition:

Maintenance Activity/Inactivity:

Process Design Failure:

Unsuitable Equipment:

Unusual Weather Condition:

Management Error:

Other Contributing Factor:

Off-Site Responders Notified

Off-Site Responders Notified:

Notified and Responded

Changes Introduced as a Result of the Accident

Improved or Upgraded Equipment:

Revised Maintenance: Yes

Revised Training:

Revised Operating Procedures:

New Process Controls:

New Mitigation Systems:

Revised Emergency Response Plan:

Changed Process:

Reduced Inventory:

None:

Other Changes Introduced:

Confidential Business Information

CBI Claimed:

Chemicals in Accident History

Accident Chemical ID:	1000021410
Quantity Released (lbs):	9
Percent Weight:	31.0
Chemical Name:	Hydrocyanic acid
CAS Number:	74-90-8
Flammable/Toxic:	Toxic

Accident History ID: 1000041858

Date of Accident:	10-Jun-2015
Time Accident Began (HHMM):	0415
NAICS Code of Process Involved:	325199
NAICS Description:	All Other Basic Organic Chemical Manufacturing
Release Duration:	001 Hours 00 Minutes

Release Event

Gas Release:	Yes
Liquid Spill/Evaporation:	
Fire:	
Explosion:	
Uncontrolled/Runaway Reaction:	

Release Source

Storage Vessel:	
Piping:	
Process Vessel:	
Transfer Hose:	
Valve:	
Pump:	
Joint:	Yes
Other Release Source:	

Weather Conditions at the Time of Event

Wind Speed:	1.0
Units:	miles/h
Direction:	NW
Temperature:	70
Atmospheric Stability Class:	D
Precipitation Present:	
Unknown Weather Conditions:	

On-Site Impacts

Employee or Contractor Deaths:	1
Public Responder Deaths:	0
Public Deaths:	0
Employee or Contractor Injuries:	0
Public Responder Injuries:	0
Public Injuries:	0
On-Site Property Damage (\$):	0

Known Off-Site Impacts

Deaths:	0
Hospitalization:	0
Other Medical Treatments:	0
Evacuated:	0
Sheltered-in-Place:	0
Off-Site Property Damage (\$):	0

Environmental Damage

Fish or Animal Kills:
Tree, Lawn, Shrub, or Crop Damage:
Water Contamination:
Soil Contamination:
Other Environmental Damage:

Initiating Event

Initiating Event: Equipment Failure

Contributing Factors

Equipment Failure:
Human Error:
Improper Procedures:
Overpressurization:
Upset Condition:
By-Pass Condition:
Maintenance Activity/Inactivity: Yes
Process Design Failure:
Unsuitable Equipment:
Unusual Weather Condition:
Management Error:
Other Contributing Factor:

Off-Site Responders Notified

Off-Site Responders Notified: No, not notified

Changes Introduced as a Result of the Accident

Improved or Upgraded Equipment: Yes
Revised Maintenance:
Revised Training: Yes
Revised Operating Procedures: Yes
New Process Controls:
New Mitigation Systems:
Revised Emergency Response Plan: Yes
Changed Process: Yes
Reduced Inventory:
None:
Other Changes Introduced:

Confidential Business Information

CBI Claimed:

Chemicals in Accident History

Accident Chemical ID:	1000033355
Quantity Released (lbs):	3
Percent Weight:	100.0
Chemical Name:	Hydrocyanic acid
CAS Number:	74-90-8
Flammable/Toxic:	Toxic

Section 7. Program Level 3

Description

This process includes three interconnected production units, Acrylonitrile, Acetone Cyanohydrine and Acetonitrile. Everything in this prevention program applies to all three units however the dates were selected from the sections of the plant pertaining to the acrylonitrile production unit.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000041868
Chemical Name:	Hydrocyanic acid
Flammable/Toxic:	Toxic
CAS Number:	74-90-8

Process ID:	1000040571
Description:	Acrylonitrile Mfg
Prevention Program Level 3 ID:	1000035440
NAICS Code:	325199

Prevention Program Chemical ID:	1000041870
Chemical Name:	Flammable Mixture
Flammable/Toxic:	Flammable
CAS Number:	00-11-11

Process ID:	1000040571
Description:	Acrylonitrile Mfg
Prevention Program Level 3 ID:	1000035440
NAICS Code:	325199

Prevention Program Chemical ID:	1000041864
Chemical Name:	Acrylonitrile [2-Propenenitrile]
Flammable/Toxic:	Toxic
CAS Number:	107-13-1

Process ID:	1000040571
Description:	Acrylonitrile Mfg
Prevention Program Level 3 ID:	1000035440
NAICS Code:	325199

Prevention Program Chemical ID:	1000041866
Chemical Name:	Butane
Flammable/Toxic:	Flammable
CAS Number:	106-97-8

Process ID:	1000040571
Description:	Acrylonitrile Mfg
Prevention Program Level 3 ID:	1000035440

NAICS Code: 325199

Prevention Program Chemical ID: 1000041865
Chemical Name: Ammonia (anhydrous)
Flammable/Toxic: Toxic
CAS Number: 7664-41-7

Process ID: 1000040571
Description: Acrylonitrile Mfg
Prevention Program Level 3 ID: 1000035440
NAICS Code: 325199

Prevention Program Chemical ID: 1000041869
Chemical Name: Sulfur dioxide (anhydrous)
Flammable/Toxic: Toxic
CAS Number: 7446-09-5

Process ID: 1000040571
Description: Acrylonitrile Mfg
Prevention Program Level 3 ID: 1000035440
NAICS Code: 325199

Prevention Program Chemical ID: 1000041867
Chemical Name: Chlorine
Flammable/Toxic: Toxic
CAS Number: 7782-50-5

Process ID: 1000040571
Description: Acrylonitrile Mfg
Prevention Program Level 3 ID: 1000035440
NAICS Code: 325199

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised): 12-Nov-2012

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update): 12-Nov-2012

The Technique Used

What If:
Checklist:
What If/Checklist:
HAZOP: Yes
Failure Mode and Effects Analysis:
Fault Tree Analysis:

Other Technique Used:

PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):

15-Apr-2013

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	Yes
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	Yes
Floods (Flood Plain):	Yes
Tornado:	Yes
Hurricanes:	Yes
Other Major Hazard Identified:	

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	Yes
Flares:	Yes
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	Yes
Emergency Air Supply:	Yes
Emergency Power:	Yes
Backup Pump:	Yes
Grounding Equipment:	Yes
Inhibitor Addition:	Yes
Rupture Disks:	Yes
Excess Flow Device:	Yes
Quench System:	Yes
Purge System:	Yes
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	Yes
Fire Walls:	
Blast Walls:	
Deluge System:	Yes
Water Curtain:	

Enclosure:	
Neutralization:	Yes
None:	
Other Mitigation System in Use:	Foam Chambers for tanks, fire monitor system for water sprays, fusible link valves

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	Manual perimeter monitoring during emergencies, offsite monitoring capabilities

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	
Change Process Parameters:	
Installation of Process Controls:	
Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	
None:	Yes
Other Changes Since Last PHA or PHA Update:	

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	12-Nov-2012
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Training

Training Revision Date (The date of the most recent review or revision of training programs):	02-Dec-2010
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The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	CBT

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	Yes
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	Group Discussion

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures): 02-Dec-2010

Equipment Inspection Date (The date of the most recent equipment inspection or test): 30-Jan-2013

Equipment Tested (Equipment most recently inspected or tested): Spray Dryer Heater, BC-1101

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures): 24-Jan-2013

Change Management Revision Date (The date of the most recent review or revision of management of change procedures): 02-Dec-2010

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review): 08-Jan-2013

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit): 02-Dec-2010

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit): 15-Feb-2013

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)): 24-Jan-2013

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation): 25-Jan-2013

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans): 02-Dec-2010

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures): 02-Dec-2010

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures): 02-Dec-2010

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance): 01-Dec-2012

Confidential Business Information

CBI Claimed:

Section 8. Program Level 2

No records found.

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?): Yes

Facility Plan (Does facility have its own written emergency response plan?): Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?): Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?): Yes

Healthcare (Does facility's ER plan include information on emergency health care?): Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan): 21-May-2012

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees): 25-Oct-2012

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): Calhoun County Emergency Management

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): (361) 553-4400

Subject to

OSHA Regulations at 29 CFR 1910.38: Yes

OSHA Regulations at 29 CFR 1910.120: Yes

Clean Water Regulations at 40 CFR 112: Yes

RCRA Regulations at CFR 264, 265, and 279.52: Yes

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254: Yes

State EPCRA Rules or Laws: Yes

Other (Specify):

Executive Summary

Ineos Green Lake RMP Executive Summary

1. Accidental Release Prevention and Emergency Response Policies

We at Ineos are strongly committed to employee, public and environmental safety. This commitment is inherent to a comprehensive accidental release prevention program in place that covers areas such as design, installation, operating procedures, maintenance, and employee training associated with the processes at our facility. It is our policy to implement appropriate controls to prevent possible releases of regulated substances. Unforeseeably, if such a release does occur, our highly trained emergency response personnel are at hand to control and mitigate the effects of the release.

2. The Stationary Source and the Regulated Substances Handled

The process used to produce Ineos Green Lake products contain quantities of flammable or listed hazardous chemicals which require application of Process Safety Management (PSM) as required in OSHA 29 CFR Part 1910 and the EPA Risk Management Program (RMP). INEOS management strongly supports Process Safety Management and the Risk Management Program and recognises it as a good business practice as well as a good approach to protecting workers and the public from industrial operation hazards. Ineos Green Lake applies the basic principles of Process Safety Management and the Risk Management Program.

Ineos has 8 EPA RMP regulated substances present at our facility above the threshold quantity. These substances include;

Acrylonitrile
Ammonia
Butane
Propylene
Propane
Chlorine
Sulfur Dioxide
Hydrogen Cyanide

Acrylonitrile is the end product of our process. Ammonia (anhydrous) and Propylene are utilized as raw materials in the production of Acrylonitrile. Propane is an impurity in the Propylene. Butane is utilized in catalyst activation. Chlorine is utilized in water purification. Sulfur Dioxide is utilized as an inhibitor. A by-product of the Acrylonitrile process is Hydrogen Cyanide. Hydrogen Cyanide is processed into Acetone Cyanohydrine for shipment. Acetone Cyanohydrine is not a listed chemical by the EPA RMP.

3. deleted

4. Accidental Release Prevention Program

Our facility has taken all the necessary steps to comply with the accidental release prevention requirements set out under 40 CFR part 68 of the EPA.

The following sections briefly describe the elements of our release prevention program that are in place at our stationary source.

Process Safety Information

Ineos maintains a detailed record of written safety information that describes the chemical hazards, operating parameters and equipment designs associated with all processes.

Process Hazard Analysis

Our facility conducts comprehensive studies to ensure that hazards associated with our processes are identified and controlled efficiently. The HAZOP, What-If, and Checklist methodologies are used to carry out these analyses. The studies are undertaken by a team of qualified personnel with expertise in engineering and process operations and are revalidated at 5 year intervals. Any findings related to the hazard analysis are addressed in a timely manner.

Operating Procedures

For the purposes of safely conducting activities within our covered processes, Ineos maintains written operating procedures. These procedures address various modes of operation such as initial startup, normal operations, temporary operations, emergency shutdown, emergency operations, normal shutdown and startup after a turnaround. The information is regularly reviewed and is readily accessible to operators involved with the processes.

Training

Ineos has a comprehensive training program in place to ensure that employees that are operating processes are completely competent in the operating procedures associated with these processes. New employees receive basic training in process operations followed by on-the-job supervision until they are deemed competent to work independently. Refresher training is provided at least every 3 years and more frequently as needed.

Mechanical Integrity

Ineos carries out documented maintenance checks on process equipment to ensure proper functions. Process equipment examined by these checks include among others; pressure vessels, storage tanks, piping systems, relief and vent systems, emergency shutdown systems, controls and pumps. Maintenance operations are carried out by qualified personnel with training in maintenance practices. Furthermore, these personnel are offered specialized training as needed. Any equipment deficiencies identified by the maintenance checks are corrected in a safe and timely manner.

Management of Change

Written procedures are in place at Ineos to manage changes in process chemicals, technology, equipment and procedures. Process operators, maintenance personnel or any other employee whose job tasks are affected by a modification in process conditions are promptly made aware of and offered training to deal with the modification.

Pre-startup Reviews

Pre-start up safety reviews related to new processes and to modifications in established processes are conducted as a regular practice at Ineos. These reviews are conducted to confirm that construction, equipment, operating and maintenance procedures are suitable for safe start-up prior to placing equipment into operation.

Compliance Audits

Ineos conducts audits on a regular basis to determine whether the provisions set out under the RMP rule are being implemented. These audits are carried out at least every 3 years and any corrective actions required as a result of the audits are undertaken in a safe and prompt manner.

Incident Investigation

Ineos promptly investigates any incident that has resulted in, or could reasonably result in a catastrophic release of a regulated substance. These investigations are undertaken to identify the situation leading to the incident as well as any corrective actions to prevent the release from reoccurring. All reports are retained for a minimum of 5 years.

Employee Participation

Ineos truly believes that process safety management and accident prevention is a team effort. Company employees are strongly encouraged to express their views concerning accident prevention issues and to recommend improvements. In addition, our employees have access to all information created as part of the facility's implementation to the RMP rule, in particular, information resulting from process hazard analyses.

Contractors

Ineos hires contractors to conduct specialized maintenance and construction activities. Prior to selecting a contractor, a thorough evaluation of safety performance of the contractor is carried out. Ineos has a strict policy of informing the contractors of known potential hazards related the contractor's work and the processes. Contractors are also informed of all the procedures for emergency response should an accidental release of a regulated substance occur.

5. Five-year Accident History

Ineos has had an excellent record of preventing accidental releases over the last 5 years. On January 20, 2009, the site experienced a failure on an elbow to a sump at the barge dock. This allowed Acetone Cyanohydrin (containing hydrocyanic acid) to

weep into the water. This resulted in a fish kill.

6. Emergency Response Plan

Ineos carries a written emergency response plan to deal with accidental releases of hazardous materials. The plan includes all aspects of emergency response including adequate first aid and medical treatment, evacuations, notification of local emergency response agencies and the public, as well as post-incident decontamination of affected areas.

To ensure proper functioning, our emergency response equipment is regularly inspected and serviced. In addition, the plan is promptly updated to reflect any pertinent changes taking place within our processes that would require a modified emergency response. A new ambulance and an off-site response vehicle were purchased in 2004. A new fire truck was purchased in 2005.

7. Planned Changes to Improve Safety

The site added a requirement to conduct LOPA studies on all new and revalidated HAZOPs. The site initiated quarterly management audits that include elements of PSM/RMP. Additionally, the management team conducts a monthly housekeeping audit that incorporates PSM/RMP audit items (ie, fire proofing, insulating, painting, etc). The site is currently in the process of implementing a Behavior-Based Safety Program.

8. Latest process change.

There have been no process changes since 2009.



Facility Information

Facility **INEOS USA LLC - Green Lake**

Company

Filing Year 2011

Department SHE

Address 13050 Texas Highway 185
Port Lavaca, Calhoun County
TX - 77979

Latitude 28.3357

Longitude -96.4952

Employees PG - Plant Entrance (General)

Employees 137

Email Information not available

Type of Facility **Tier2**

Data Management Last modified Date: **2012-04-24 00:00:00.0 UTC**
First Submit Date: **2012-02-27 00:00:00.0 UTC**
Data Submitted by: **E. J. Sockell**
Data Entered by: **Duk(dxk051000@utdallas.edu)**, Access ID: **1017527**
SIC - 2819 - INDUSTRIAL INORGANIC CHEMICALS
SIC - 2869 - INDUST. ORGANIC CHEMICALS NEC
NAICS - 325188 - All Other Basic Inorganic Chemical Manufacturing
NAICS - 325199 - All Other Basic Organic Chemical Manufacturing

Notes Information not available

Facility Contact Information

Name	Contact Type	Phone	Email
Green Lake INEOS USA LLC	Emergency Contact		

		24-hour - (361) 552-8411 Work - (361) 552-8669	
Wesley Waida	Emergency Contact	24-hour - (361) 552-8411 Work - (361) 552-8642	wesley.waida@ineos.com
Wesley Waida	Emergency Contact	24-hour - (361) 552-8411 Work - (361) 552-8642	wesley.waida@ineos.com
Green Lake INEOS USA LLC	Emergency Contact	24-hour - (361) 552-8411 Work - (361) 552-8669	
Owner/Operator INEOS USA LLC	Owner / Operator	Work - 281-535-4285 Mobile - Cell - 832-922-3615	

Chemical Inventory Information

Chemical (Click for ERG link)	CAS #	Max Qty. (lbs)	Avg Qty. (lbs)	Max Amount in largest container (lbs)	NFPA Code <div>H F R S</div>	Properties	Fact Sheets
3D Trasar (Nalco 3DT192) (EHS Chemical)	7664-93-9	99,999	99,999	20,000	<div>3 0 2</div> <div>W</div>	Mixture Liquid Acute	MSDS Profile CHRIS
Synonyms: Acide sulfurique (dot french);Acide sulfurique, contenant plus de 51% d'acide (dot french);Acido sulf+rico (dot spanish);Acido sulf+rico, con m-s del 51% de -cido (dot spanish);Battery acid;Bov;Chamber acid;Contact acid;Dihydrogen sulfate;Dipping;							
ACETIC ACID	64-19-7	99,999	99,999	59,955	<div>3 2 0 -</div>	Mixture Liquid Acute Fire	MSDS Profile CHRIS
Synonyms: Acetic acid;Acetic acid (aqueous);Acetic acid, [glacial];Acetic acid, glacial;Aci-jel;Acide ac+tique, glacial (dot french);Acido ac+tico, glacial (dot spanish);Ethanoic acid;Ethanoic acid monomer;Ethylic acid;Glacial acetic acid;Glacial acetic;							
ACETONE	67-64-1	50,000,000	9,999,999	8,932,738	<div>1 3 0 -</div>	Pure Pressure Mixture Liquid Gas Acute Fire Chronic	MSDS Profile CHRIS

Synonyms: 2-propanone;Acetona (dot spanish);Acetone;Ac+tone (dot french);Beta-ketopropane;Chevron acetone;Dimethyl ketone;Dimethylformaldehyde;Dimethylketal;Ketone, dimethyl;Ketone propane;Methyl ketone;Propanone;Pyroacetic acid;Pyroacetic ether;Rcra;

ACETONE CYANOHYDRIN
(EHS Chemical)

75-86-5

50,000,000

9,999,999

12,500,083

4 2 2 -

Pure
Pressure
Mixture
Liquid
Acute
Fire
Chronic
Reactive
EHS

[MSDS](#)

[Profile](#)

[CHRIS](#)

Synonyms: 2-cyano-2-hydroxypropane;2-cyano-2-propanol;2-hydroxy-2-cyanopropane;2-hydroxy-2-methylpropionitrile;2-hydroxy-2-methylpropanenitrile;2-hydroxy-2-methylpropionitrile;2-hydroxy-2-methylpropanenitrile{acetone cyanohydrin};2-hydroxyisobutyronitrile;

ACETONITRILE

75-05-8

9,999,999

9,999,999

1,327,049

2 3 1 -

Pure
Pressure
Mixture
Liquid
Gas
Acute
Fire
Chronic

[MSDS](#)

[Profile](#)

[CHRIS](#)

Synonyms: Acetonitrile;Ac+tonitrile (dot french);Acetonitrile cluster;Acetonitrilo (dot spanish);Cianuro de metilo (dot spanish);Cyanomethane;Cyanure de m+thyle (dot french);Ethanenitrile;Ethyl nitrile;Methane, cyano-;Methanecarbonitrile;Methyl cyanide;

Acryi-Ex EC3354A
NALCOAntipolymerization
Agent

99,999

99,999

33,200

-

Mixture
Liquid
Acute

Synonyms:

ACRYLONITRILE
(EHS Chemical)

107-13-1

50,000,000

50,000,000

9,228,696

4 3 2 -

Pure
Pressure
Mixture
Liquid
Gas
Acute
Fire
Chronic
Reactive
EHS

[MSDS](#)

[Profile](#)

[CHRIS](#)

Synonyms: 2-propenenitrile;Acrlonitrilo, inhibido (dot spanish);Acritet;Acrylon;Acrylonitrile;Acrylonitrile, inhibited;Acrylonitrile monomer;Acrylonitrile, stabilis+ (dot french);An;Carbacryl;Cyanoethene;Cyanoethylene;Ent 54;Fumigrain;Millers fumigra;

Aluminum Chloride Hydroxide
Sulphate

39290-78-3

99,999

9,999

10,920

-

Mixture
Liquid
Acute

[MSDS](#)

Synonyms:

AMMONIA (EHS Chemical)	7664-41-7	50,000,000	50,000,000	15,317,769	310-	Pure Pressure Mixture Liquid Acute Fire Chronic EHS	MSDS Profile
Synonyms: Ammonia, solution, with more than 10% but not more than 35% ammonia;Ammoniac, solution aqueuse, contenant plus de 10% mais au maximum 35% dammoniac (dot french);Ammonium hydroxide, with more than 10% but not more than 35% ammonia;Hidr+xido de amonio, c;							
Ammonium Heptamolybdate	12054-85-2	99,999	99,999	300	200-	Pure Solid Acute Chronic	MSDS
Synonyms:							
AMMONIUM SULFATE	7783-20-2	9,999,999	9,999,999	100,000	300-	Pure Pressure Solid Liquid Acute Chronic	MSDS Profile CHRIS
Synonyms: Ammonium sulfate;							
AMORPHOUS ALUMINA SILICATE (Femco Grade H5K Perlite)	93763-70-3	99,999	99,999	120	100-	Mixture Solid Acute	MSDS Profile
Synonyms: Perlite;							
CHLORINE (EHS Chemical)	7782-50-5	99,999	99,999	2,000	400- OX	Pure Pressure Liquid Gas Acute EHS	MSDS Profile CHRIS
Synonyms: Bertholite;Chlore (dot french);Chlorine;Chlorine mol.;Chlorine molecule (cl2);Cloro (dot spanish);Diatomic chlorine;Dichlorine;Molecular chlorine;							
CYCLOHEXYLAMINE (Nalco Tri Act 1800) (EHS Chemical)	108-91-8	999	999	578	230-	Mixture Liquid Acute Fire EHS	MSDS Profile CHRIS
Synonyms: 1-aminocyclohexane;1-cyclohexylamine;Aminocyclohexane;Aminohexahydrobenzene;Benzenamine, hexahydro-;Cha;Ciclohexilamina (dot spanish);Cyclohexanamine;Cyclohexylamine;Cyclohexylamine (dot french);Hexahydroaniline;Hexahydrobenzenamine;Monocycloh;							
DIESEL FUEL	8008-20-6	99,999	99,999	45,500	220-	Mixture Liquid	

						Acute Fire Chronic	MSDS Profile CHRIS
Synonyms: Af 100 (pesticide);Avtur;Avtur (pesticide);Bayol 35;Bitumen cutter;Coal oil;Escaid 100;Escaid 110;Exxsol d 200/240;Fuel oil no. 1;Fuel oil, no.5;Fuels, kerosine;Illuminating oil;Ink oil;Jet fuel: jp-1;Kerosene;K+ros+ne (dot french);Keros;							
GASOLINE	8006-61-9	99,999	99,999	45,500	1 3 0 -	Mixture Liquid Acute Fire Chronic	MSDS Profile
Synonyms: Gasolene;Light gasoline;Motor fuel;Motor spirits;Natural gasoline;Petrol;							
GLYCOLIC ACID	79-14-1	99,999	99,999	51,276	3 0 0 -	Pure Mixture Liquid Acute	MSDS Profile
Synonyms: Hydroxyacetic acid;Glycolic acid;							
Hydrated Lime	1305-62-0	99,999	99,999	40,000	3 0 0 -	Pure Solid Acute	MSDS Profile CHRIS
Synonyms: Calcium hydrate;Calcium hydroxide;Caustic lime;Hydrated lime;Slaked lime;							
HYDROGEN CYANIDE (EHS Chemical)	74-90-8	9,999,999	99,999	225,084	4 4 1 -	Pure Pressure Mixture Liquid Gas Acute Fire Chronic Reactive EHS	MSDS Profile
Synonyms: Acide cyanhydrique, en solution aqueuse, contenant au plus 20% d'acide cyanhydrique (dot french);Acide cyanhydrique, en solution aqueuse, contenant au plus 20% de cyanure d'hydrogène (dot french);Acido cianh-drico, soluciones acuosas de, con no m-s del 20;							
HYDROQUINONE (EHS Chemical)	123-31-9	99,999	99,999	2,475	2 1 0 -	Pure Mixture Solid Liquid Acute Chronic EHS	MSDS Profile CHRIS
Synonyms: 1,4-benzenediol;1,4-benzoquinol;1,4-dihydroxybenzene;4-hydroxyphenol;Aida;Alpha-hydroquinone;Arctuvín;Benzene, p-dihydroxy-;Benzohydroquinone;Benzoquinol;Beta-quinol;Black and white bleaching cream;Bq(h);Diak 5;Dihydroquinone;Dihydroxybenze;							

ISOBUTYL ALCOHOL	78-83-1	999,999	99,999	4,143	1 3 0 -	Mixture Liquid Acute Fire Chronic	MSDS Profile CHRIS
Synonyms: Isobutyl alcohol , 1-hydroxymethylpropane;1-isobutanol;1-propanol, 2-methyl;2-methyl propanol;2-methyl propyl alcohol;2-methyl-1-propanol;2-methylpropan-1-ol;2-methylpropyl alcohol;Fermentation but;							
LUBE OIL		99,999	99,999	3,500	-	Pure Liquid Acute Chronic	
Synonyms:							
PHOSPHORIC ACID	7664-38-2	999,999	99,999	79,050	2 0 0 -	Mixture Liquid Acute Reactive	MSDS Profile CHRIS
Synonyms: 3m etching liquid;Acide phosphorique (dot french);Acido fosf+rico (dot spanish);C 134;C 134 (acid);C 434;C 434 (acid);Decon 4512;Evits;K-etchant;Kefo;Mikro klene df;Orthophosphoric acid;Phosphoric acid;Phosphoric acid (aqueous);Phosphoric a;							
PROPANE	74-98-6	9,999,999	999,999	198,688	1 4 0 -	Pure Pressure Mixture Liquid Gas Acute Fire Chronic	MSDS Profile CHRIS
Synonyms: Bottled gas;Dimethyl methane;Dimethylmethane;Hc 290;Liquefied petroleum gas;Lpg;N-propane;Propane;Propane (dot french);Propane en m+lange (dot french);Propane mixture;Propano (dot spanish);Propano, en mezcla (dot spanish);Propyl hydride;R 29;							
PROPIONITRILE (EHS Chemical)	107-12-0	9,999	9,999	1,728	4 3 1 -	Pure Pressure Mixture Gas Acute Fire Chronic EHS	MSDS Profile CHRIS
Synonyms: Cyanoethane;Ether cyanatus;Ethyl cyanide;Ethylcyanide;Hydrocyanic ether;N-propanenitrile;Propanenitrile;Propionic nitrile;Propionitrile;Propionitrile (dot french);Propionitrilo (dot spanish);Propiononitrile;Propyl nitrile;Rcra waste number p10;							
PROPYLENE	115-07-1	50,000,000	9,999,999	2,838,405	1 4 1 -	Pure Pressure Mixture Liquid Gas	MSDS Profile CHRIS

						Acute Fire Chronic	
Synonyms: 1-propene;1-propylene;Methylethene;Methylethylene;Nci-c50077;Propene;Propileno (dot spanish);Propylene;Propyl+ne (dot french);R 1270;Un1075;Un1077;							
SODIUM CARBONATE	497-19-8	99,999	99,999	45,000	2 0 0 -	Pure Mixture Solid Liquid Acute	MSDS Profile
Synonyms: Sodium carbonate;Soda ash;Disodium carbonate;Soda;Calcined soda;Ash;Carbonic acid disodium salt;							
SODIUM HYDROXIDE	1310-73-2	999,999	999,999	89,400	3 0 1 -	Pure Mixture Liquid Acute	MSDS Profile CHRIS
Synonyms: Caustic soda;Caustic soda, bead;Caustic soda, flake;Caustic soda, granular;Caustic soda, solid;Hidr+xido de sodio, en escamas (dot spanish);Hidr+xido de sodio, en gr-nulos (dot spanish);Hidr+xido de sodio, granular (dot spanish);Hidr+xido de sodio;							
SULFONATED DIVINYLBENZENE/STYRENE COPOLYMER, H ION FORM (Amberlyst Resin)	39389-20-3	99,999	99,999	25,720	- - - -	Mixture Solid Acute	
Synonyms:							
SULFUR DIOXIDE (EHS Chemical)	7446-09-5	99,999	99,999	51,225	2 0 0 -	Pure Pressure Liquid Gas Acute Chronic EHS	MSDS Profile CHRIS
Synonyms: Di+xido de azufre (dot spanish);Di+xido de azufre, licuado (dot spanish);Dioxyde de soufre (dot french);Dioxyde de soufre, liqu+fi+ (dot french);Fermenticide liquid;Sulfur dioxide;Sulfur dioxide (anhydrous);Sulfur dioxide (so2);Sulfur dioxide, liq;							
SULFURIC ACID (EHS Chemical)	7664-93-9	9,999,999	9,999,999	1,585,685	3 0 2 W	Pure Mixture Liquid Acute Chronic Reactive EHS	MSDS Profile CHRIS
Synonyms: Acide sulfurique (dot french);Acide sulfurique, contenant plus de 51% d'acide (dot french);Acido sulf+rico (dot spanish);Acido sulf+rico, con m-s del 51% de -cido (dot spanish);Battery acid;Bov;Chamber acid;Contact acid;Dihydrogen sulfate;Dipping;							
TRADE SECRET FORMULA - NITRILE CATALYSTS		9,999,999	9,999,999	490,000	- - - -	Mixture Solid	

						Acute Chronic	
Synonyms:							
TRADE SECRET FORMULA - CATALYST FV-100		999,999	999,999	30,000	□ □ □ -	Mixture Solid Acute	
Synonyms:							
UREA (NOxOUT-A)	57- 13-6	99,999	99,999	88,886	1 0 0 -	Mixture Liquid Acute	MSDS Profile CHRIS
Synonyms: Aquadrate;B-i-k;Benural 70;Carbamide;Carbamimidic acid;Carbonyl diamide;Carbonyldiamide;Carbonyldiamine;Isourea;Keratinamin kowa;Nci-c02119;Nimin;Pastaron;Pastaron 10;Pastaron 20;Pastaron 20 soft;Pseudourea;Ur;Urea;Urea perhydrate;Urea;							
VANADIUM PENTOXIDE (EHS Chemical)	1314- 62-1	99,999	99,999	5,000	3 0 0 -	Mixture Solid Liquid Acute Chronic EHS	MSDS Profile CHRIS
Synonyms: C.i. 77938;C.i. 77938;Ci 77938;Divanadium pentaoxide;Divanadium pentoxide;Divanadium pentoxide fume;Pentaoxodivanadium;Pent+xido de vanadio (dot spanish);Pentoxyde de vanadium (dot french);Vanadia;Vanadic anhydride;Vanadic anhydride fume;Vana;							

Other Useful Links

Facility Weather

[Facility Weather](#)